

CONTRACT COMPLIANCE PLAN

Statement of Policy

It is the policy of the Minnesota Housing Finance Agency to take affirmative action to provide equal opportunity in all of our projects programs and other endeavors. The Agency's goal is to achieve a client and recipient mix that is representative of the people who live in our state and our communities, so that all employment and contractual benefits that develop as a result of our programs will be shared by all Minnesotans. This policy applies to all Agency employees and everyone with whom we do business.

Purpose

The purpose of this Plan is to make the Agency's commitment to act affirmatively to achieve equal opportunity in all facets of its operation, clear to both staff and those outside the Agency with whom we do business.

Goals

Our goal is to ensure minority and female business owners equal access to business opportunities on MHFA financed projects and the presence of minorities and women at all levels on the staffs of the program participants having contractual agreements with MHFA. The Agency's goal is to ensure that the workforces on the projects and programs we finance reflect demographically the area they are located in. Our goal is to ensure equal business opportunity to minority and female businesses on the projects we finance and equal employment opportunity in the workforces of the firms with whom we sign contractual agreements in which a contractor commits to meet the Agency's employment and business goals. These goals will apply for the length of the contract or the life of the mortgage. The Agency at its discretion may set numerical or percentage goals dependent on the location and size of a given project. Current goals will be determined by staff based on the location of the project.

Requirements

The Agency is required to comply with all state, federal and local laws¹. These requirements are passed on to everyone we do business with either by contractual agreement or Agency policy.

¹ The operations of the Minnesota Housing Finance Agency are regulated by the following Equal Opportunity Laws/Rules:

Executive Order 11246 (Affirmative Action Requirements, Government Contractors)
Executive Order 11625 (Minority Business Enterprise)
The Civil Rights Act of 1964 (Title VII)
Equal Employment Act of 1972
Minnesota Code of Agency Rules (Chapter 2, Sec. 3.012)
The Americans with Disability Act of 1990
Section 504 of The Rehabilitation Act of 1973 as amended
Minnesota Human Rights Act (Section 363.073)
Fair Housing Amendments Act of 1988

Sanctions

The Agency has the contractual authority to demand full payment of any loan or grant, stop processing any project at any stage, and to cease to do business with anyone that does not follow our affirmative action policies or fails to meet their contractual equal opportunity obligations.

Responsible Persons

MHFA's Board of Directors – Approves Agency Equal Opportunity Policy, Goals and Requirements, evaluates successes, imposes sanctions.

Commissioner – Take direct action, directs staff, reports and recommends necessary action in specific instances to the Board.

Fair Housing Director – Responsible for carrying out the Agency's equal opportunity programs and the meeting of Agency equal opportunity goals. Approves submitted materials, applies requirements, monitors projects, submits reports and makes recommendations to the Commissioner.

Program Managers – Responsible for following all equal opportunity laws and the achievement of all contractual responsibilities in their program areas.

Project Coordinators – Responsible for meeting all requirements in their projects.

Developer, Owner, Grantee, Loan Recipient – Has the ultimate responsibility for meeting contractual requirements on their projects.

Prime Contractor – Shares responsibility with developer for meeting contractual equal opportunity requirements and is also responsible for the equal opportunity performance of all subcontractors.